UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JUN 24 2016

CERTIFIED MAIL 7009 1680 0000 7642 3076
RETURN RECEIPT REQUESTED

Mr. Joe Galderon
Plant Manager
Canam Steel Corporation
9 Unytite Drive
Peru, Illinois 61354

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID: ILR 000 067 249

Dear Mr. Calderon:

On June 16, 2015 a representative of the U.S. Environmental Protection Agency inspected the Canam Steel Corporation (CSC) facility located in Peru, Illinois. As a large quantity generator of hazardous waste, CSC is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate CSC's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by CSC, EPA's review of records pertaining to CSC, and the inspector's observations, EPA has determined that CSC has unlawfully stored hazardous waste without a permit or interim status as a result of CSC's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which CSC was out of compliance at the time of the inspection in paragraph 1, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 2 – 7 are also independent TSD requirements incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of CSC to comply

with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

At the time of the inspection, CSC was out of compliance with the following large quantity generator permit exemption condition:

1. Date When Each Period of Accumulation Begins

Under Ill. Admin. Code tit. 35 § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, CSC was storing hazardous waste in a super sack that was approximately on cubic yard in size and was located adjacent to the 90 day hazardous waste storage area. The super sack was not marked with the date upon which the period of accumulation of hazardous waste began.

The permit exemption conditions identified below in paragraphs 2 - 7 are also independent TSD requirements violated by CSC:

2. Use and Management of Containers

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(A) and 725.273(a) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.173(a)], a large quantity generator must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, CSC did not keep the super sack referenced in Paragraph 1 above closed during storage, and waste was not being added or removed to the super sack while it was open.

3. Written Hazardous Waste Tank Assessment

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(B) and 725.292(a)(1) – (a)(3) and (a)(5) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.192(a)(1) – (a)(3) and (a)(5)] a large quantity generator that owns or operates a new hazardous waste tank system must obtain a written assessment, reviewed and certified by an independent registered professional engineer, attesting that the system has sufficient structural integrity, is acceptable for storing hazardous waste, and has corrosion protection so that it will not collapse, rupture or fail. Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(B) and 35 § 725.292(g) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.192(g)] requires the owner or operator of a new tank system

to obtain and keep on file at the facility the design and installation certifications of the new tank system.

At the time of the inspection, CSC owned and operated three hazardous waste storage tanks that were installed on or about 2002. These three tanks store hazardous water waste generated during the cleaning operations. At the time of the inspection CSC could not provide a written hazardous waste tank assessment for its hazardous waste tanks. In addition, CSC could not provide written certification of the installation of the three tanks.

4. Containment and Detection of Releases

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(B) and 725.293(b) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.193(b)] a large quantity generator that owns or operates a new hazardous waste tank system must install a secondary containment system designed to prevent any migration of waste to soil, ground water, or surface water during the use of the tank system. Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(B) and 725.293(c)(1) – (c)(4) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.193(c)(1) – (c)(4)], the secondary containment should be constructed in accordance with the following requirements:

1) Constructed of or lined with materials that are compatible with the wastes to be placed in the tank system and must have enough strength and thickness to prevent failure;

2) Placed on a foundation or base capable of providing support to the secondary containment system;

3) Provide leak-detection system that is designed and operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste in the secondary containment; and

4) Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks and spills.

At the time of the inspection CSC could not verify that the secondary containment of the three hazardous waste tanks met the above minimum design requirements.

5. Tank Inspections

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(B) and 725.295(a) and (b) [40 C.F.R. §§ 262.34(a)(1)(ii) and 265.193(b) and (b)] a large quantity generator that owns or operates a new hazardous waste tank system must conduct daily and or weekly

inspections. These inspections must be documented in the operating record of the facility. See Ill. Admin. Code tit. 35 § 725.295(g) [40 C.F.R. § and 265.195(g)].

At the time of the inspection, CSC stated that it inspects the three hazardous waste tanks on a daily basis. However, CSC does not keep a record of these inspections.

6. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 725.116(b) and (c) [40 C.F.R. §§ 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job. *See* Ill. Admin. Code tit. 35 § 725.116(d)(1) [40 C.F.R. § 265.16(d)(1)];

2) A written job description for each position at the facility related to hazardous waste management. *See* Ill. Admin. Code tit. 35 § 725.116(d)(2) [40 C.F.R. § 265.16(d)(2)];

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management. *See* Ill. Admin. Code tit. 35 § 725.116(d)(3) [40 C.F.R. § 265.16(d)(3)]; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ill. Admin. Code tit. 35 § 725.116(d)(4) [40 C.F.R. § 265.16(d)(4)].

At the time of the inspection, CSC did not have, and was unable to provide in response to a request, a list of each position at the facility related to hazardous waste management and the name of the employee filling such position(s).

At the time of the inspection, CSC did not have, and was unable to provide in response to a request, a written description for each position related to hazardous waste management at the facility.

At the time of the inspection, CSC did not have, and was unable to provide in response to a request, a written description of the type and amount of introductory and continuing training given to employees with duties related to hazardous waste management.

At the time of the inspection, Mr. Calderon could not provide any documentation that the annual hazardous waste training was provided after 2011.

7. Contingency Plan

A large quantity generator of hazardous waste must have a contingency plan for the facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The contingency plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, and this list must be kept up to date. Where more than one person is listed one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. *See* Ill. Admin. Code tit. 35 § 725.152(d) [40 C.F.R. § 265.52(d)]. The contingency plan must describe arrangements agreed to by the local police departments, fire departments, hospitals, contractors and State and local emergency response teams to coordinate emergency services. *See* Ill. Admin. Code tit. 35 § 725.152(c) [40 C.F.R. § 265.52(c)]. A copy of this contingency plan must be submitted to all local police departments, fire departments, hospitals, contractors and State and local emergency response teams that may be called upon to provide emergency services. *See* Ill. Admin. Code tit. 35 § 725.153(b) [40 C.F.R. § 265.53(b)].

At the time of the inspection CSC's contingency plan did not describe arrangements agreed to by the local police departments, fire departments, hospitals, contractors and State and local emergency response teams to coordinate emergency services.

At the time of the inspection CSC could not provide any documentation showing that its contingency plan was submitted to all local police departments, fire departments, hospitals, contractors and State and local emergency response teams that may be called upon to provide emergency services.

By failing to comply with the conditions for a permit exemption, above, CSC became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. CSC failed to apply for such a permit. CSC's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Mr. Spiros Bourgikos, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Spiros Bourgikos, of my staff, at (321) 886-6862 or at bourgikos.spiros@epa.gov

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Canam Steel Corporation
EPA ID NUMBER:	EPA ID: ILR 000 067 249
ADDRESS:	9 Unytite Drive Peru, IL 61354
DATE OF INSPECTION:	June 16, 2015
EPA INSPECTOR:	Spiros Bourgikos Environmental Engineer

PREPARED BY: Spiros Bourgikos 7-15-2015
Spiros Bourgikos — Date
Compliance Section 1

APPROVED BY: 8-19-15
Michael Cunningham Chief — Date
Compliance Section 1

Purpose of Inspection
This inspection was an evaluation of the Canam Steel Corporation's (CSC) compliance with hazardous waste, used oil, and universal waste regulations found at Illinois' hazardous waste management rules codified at 35 IAC Parts 700-739 and the Code of Federal Regulations (CFR) at 40 CFR Parts 260-270, 273 and 279. The Illinois Environmental Protection Agency (Illinois EPA) was invited to participate in this inspection but declined. The site has notified as a large quantity generator (LQG).

Participants

Inspector(s):
Spiros Bourgikos, Environmental Engineer, EPA

Site Representative(s):
Doug Lannert, Operations Manager, CSC
Joe Calderon, Plant Manager, CSC

Introduction
On June 16, 2015, I arrived at the site at approximately 10:00 AM. I introduced myself, presented my inspector credentials and business card, and described the purpose and process by which I intended to conduct the inspection. Mr. Lannert provided me with a description of the site operations. Mr. Calderon led the tour and provided me with the records I requested for review.

I provided a Small Business Resources information sheet to Mr. Lannert. I also informed Mr. Lannert that CSC could claim any information gathered during the inspection as Confidential Business Information (CBI) including; verbal information, documents and photographs. CSC did not make a CBI claim on the information gathered during the inspection.

Site Description
CSC is a coil coater and roll former of cold rolled steel and galvanized steel. The manufacturing process begins with chemical treatment to clean and prepare a continuous metal strip for painting. The cleaning process starts in the 2,700 gallon acid tank, followed by two 1,500 gallon alkaline tanks and finishes at the 1,500 gallon water rinse tank. After the metal coil is dried, polymeric coatings are applied via roll coaters and cured in electric infrared ovens. This part of the process includes three coating lines and three curing ovens. Once dried, the coated steel coil is rewound and shipped as is or is roll formed to create steel decks, steel joists or joist girders according to the customer specifications.

There are three major hazardous waste streams at this facility: First is waste paint identified by CSC as D007 hazardous waste. The second waste steam is described as "hazardous waste solids" and includes the plastic liners of the roll coater paint pans. Plastic liners are used to facilitate faster and easier cleaning of the coater paint pans. At the end of the shift, CSC discards the plastic liners. The liners are contaminated with paint waste and are identified as D007 hazardous waste. The last major hazardous waste steam is the waste water generated from the

cleaning operations. This waste is also identified as D007 hazardous waste. CSC generates universal waste. CSC also generates used oil from the maintenance operations.

Site Tour

During the facility walkthrough, I visited the manufacturing area and the hazardous waste storage area. Both of these areas are located in the plant building. I took photographs of the various waste storage/accumulation areas during the site tour. See Attachment B for photographs taken during the inspection.

We started the tour at the beginning of the process where the coiled steel is uncoiled and sent through the four cleaning tanks. Next we walked by the three coating lines and Mr. Calderon pointed to the plastic liner of the coating line paint pans. Lastly, we visited the hazardous waste storage area. This area is located against the south wall of the plant building. The hazardous waste storage area consists of three hazardous waste tanks and one drum storage area.

Waste water from the cleaning operations is stored in three tanks (See Photograph No. 1). According to Mr. Calderon, each tank is open top and all three tanks were installed on or about 2002. All three tanks were labeled with the words, "Hazardous Waste".

The smallest of the three tanks has a capacity of 1,450 gallons and stores inorganic phosphoric acid waste. The other two tanks have a capacity of 2,900 gallons each and store potassium hydroxide. The tanks are equipped with a secondary containment made of cinder blocks. The floor of the secondary containment appeared to be in good condition with no cracks or signs of deterioration (See Photograph No. 2).

West of the storage tanks, I observed eight drums of hazardous waste (See Photograph Nos. 3 and 4). All drums were closed and labeled with the words, "Hazardous Waste". Each drum had a hazardous waste accumulation date, with the earliest date being April 29, 2015.

Adjacent to the storage drums, I observed a super sack on a wooden pallet (See Photograph Nos. 5 and 6). The sack was labeled with the words, "Hazardous Waste" and it contained the coating line paint pan liners. The volume of the sack was approximately one cubic yard and it was more than 7/8^{ths} full. According to Mr. Calderon, CSC considers this super sack a satellite accumulation container and they date it when it becomes full. At this point, I stated that according to the RCRA regulations, there is a 55 gallon limit for satellite accumulation containers. I also stated that if there are more than 55 gallons of hazardous waste in the satellite accumulation area, the container must be marked with the date when the hazardous waste accumulation began.

Records Review

During the inspection, I reviewed the following records; hazardous waste manifests, land disposal restriction notifications (LDR), training records, inspection records, annual hazardous waste reports, waste analysis records, manifests, and the contingency plan. I also completed the LQG checklist during the records review, *see* Attachment C.

During the records review, I requested that CSC provide copies of certain documents that are listed in Attachment D. None of these documents were claimed to be CBI.

Hazardous Waste Records
During this inspection, I reviewed the waste manifests for 2013, 2014 and 2015. The waste manifests were filled out properly.

Training Records
I requested to review the training records, including the annual refresher training records for 2012 and 2013 and 2014. During the inspection, CSC produced a signoff sheet for an annual hazardous waste training dated April 4, 2011. Mr. Calderon could not recall any annual hazardous waste training after 2011. CSC was also unable to produce any other training records required under 35 IAC 725.116. At this point, I requested that if CSC locates the hazardous waste training records to forward the records to me. As of the date of the completion of this report, I have not received any hazardous waste training records.

Inspection records
I requested to review the weekly inspection records of the 90-day hazardous waste storage area for 2012, 2013 and 2014. I did not find any missing weekly inspections for 2012 and 2013. However, according to Mr. Calderon, starting in 2014, CSC stopped keeping weekly inspection logs.

I also requested to review the tank daily inspection records. Mr. Calderon stated that the tanks are inspected every morning but CSC does not keep any records.

Annual Hazardous Waste Report
I reviewed the 2012, 2013 and 2014 Annual Hazardous Waste Reports. These reports were submitted to Illinois EPA on January 22, 2013, January 31, 2014 and February 19, 2015, respectively.

According to the 2015 annual report, CSC generated the following hazardous waste in 2014:

- Paint waste (D007) - 5,060 gallons;
- Hazardous waste solids (D007) - 2,478 gallons;
- Alkaline cleaners (D002) - 279 gallons; and
- Waste water for cleaning operations (D007) - 63,398 gallons.

Contingency Plan
The contingency plan was last updated on May 1, 2013. Based on my review, the following items were missing from the plan:

- The home address of the emergency coordinators.
- Arrangements agreed to by local police departments, fire departments, hospitals, contractors and State and local emergency response teams.
- Documentation to show that the contingency plan was submitted to all local emergency responders.

- The facility evacuation plan. However CSC had a facility evacuation plan as part of the facility Emergency Action Plan.

Waste Determination
During the inspection, I requested to review the profiles of some of the waste generated by CSC. Based on these records, CSC is making proper waste determinations.

Storage Tank Requirements

During the inspection, I request to review the written tank assessment reports required to be reviewed and certified by a professional engineer prior to the operation of the three tanks. CSC could not produce any written tank assessment reports. CSC produced a one page report from Chamlin & Associates, dated July 11, 2005 concerning the structural integrity of the three in-house fabricated tanks (See Attachment D).

During the inspection I requested to review the certification by a professional engineer stating that proper handling procedures were used prior to the tanks being placed I service. CSC could not produce such certification.

During the inspection I requested to review the tightness test required before tanks are placed in service. CSC could not produce this test.

During this inspection I requested to review written statement by registered professional engineers and corrosion experts required to certify the design and installation of the tanks. CSC could not produce such statements.

During the inspection I asked Mr. Calderon, whether the secondary containment was designed to detect the failure of the tanks or the failure of the secondary containment or any release of hazardous waste into the secondary containment within 24 hours. Mr. Calderon stated that he was not very familiar with the design specifications of the secondary containment.

During the inspection I requested to review the daily tank inspection records. Mr. Calderon stated that the tanks are visually inspected every morning but CSC does not keep any inspection records.

Closing Conference
I summarized the issues identified during the inspection. I again mentioned that CSC could make claims of CBI on the materials copied, photographs, and information gathered during the inspection. Mr. Calderon did not make any CBI claims. The inspection concluded at approximately 1:30 PM.

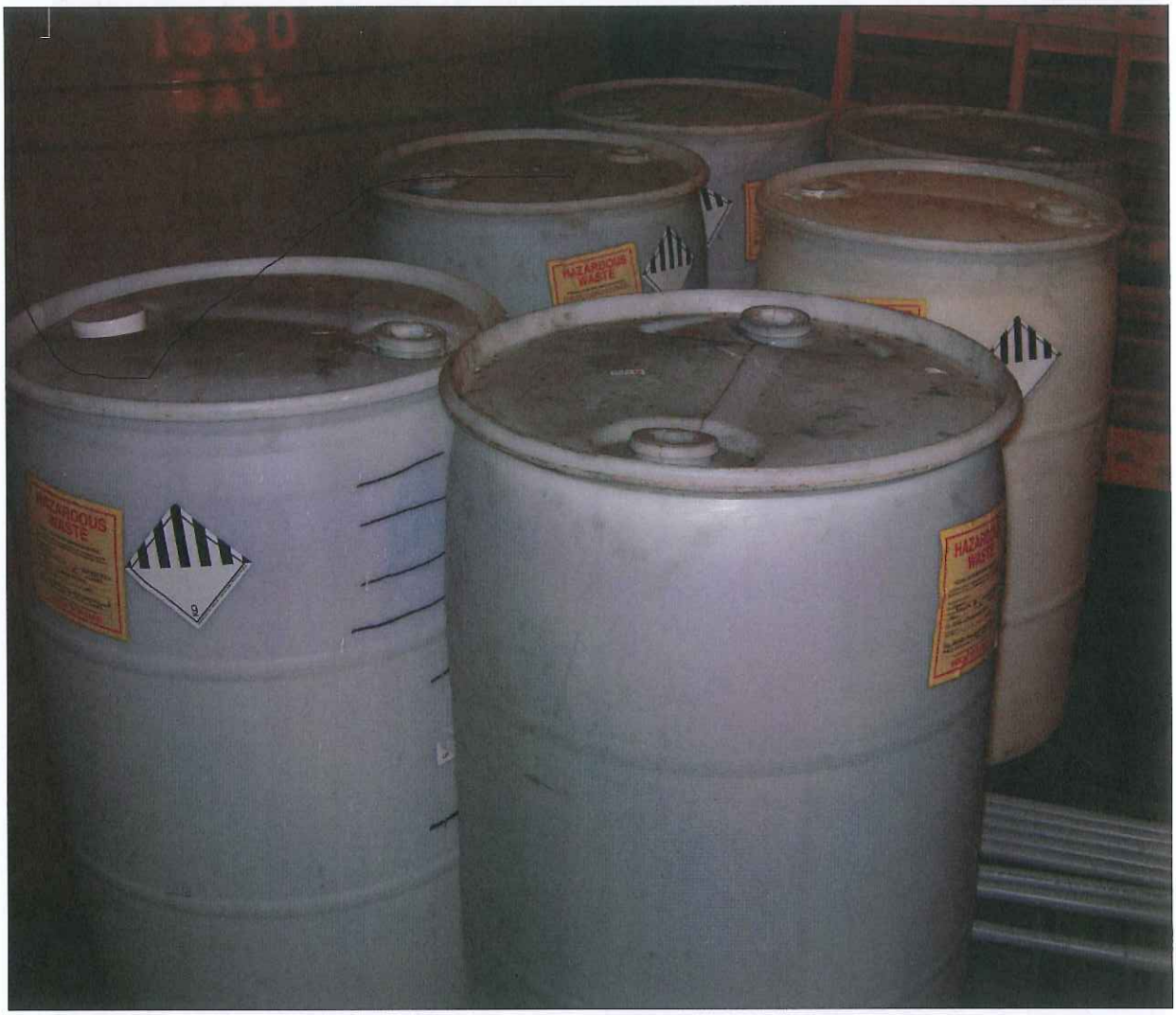
Attachments

A. Photograph Log
B. Checklist(s)
C. Document(s) Copied
D. Chamlin & Associates Analysis

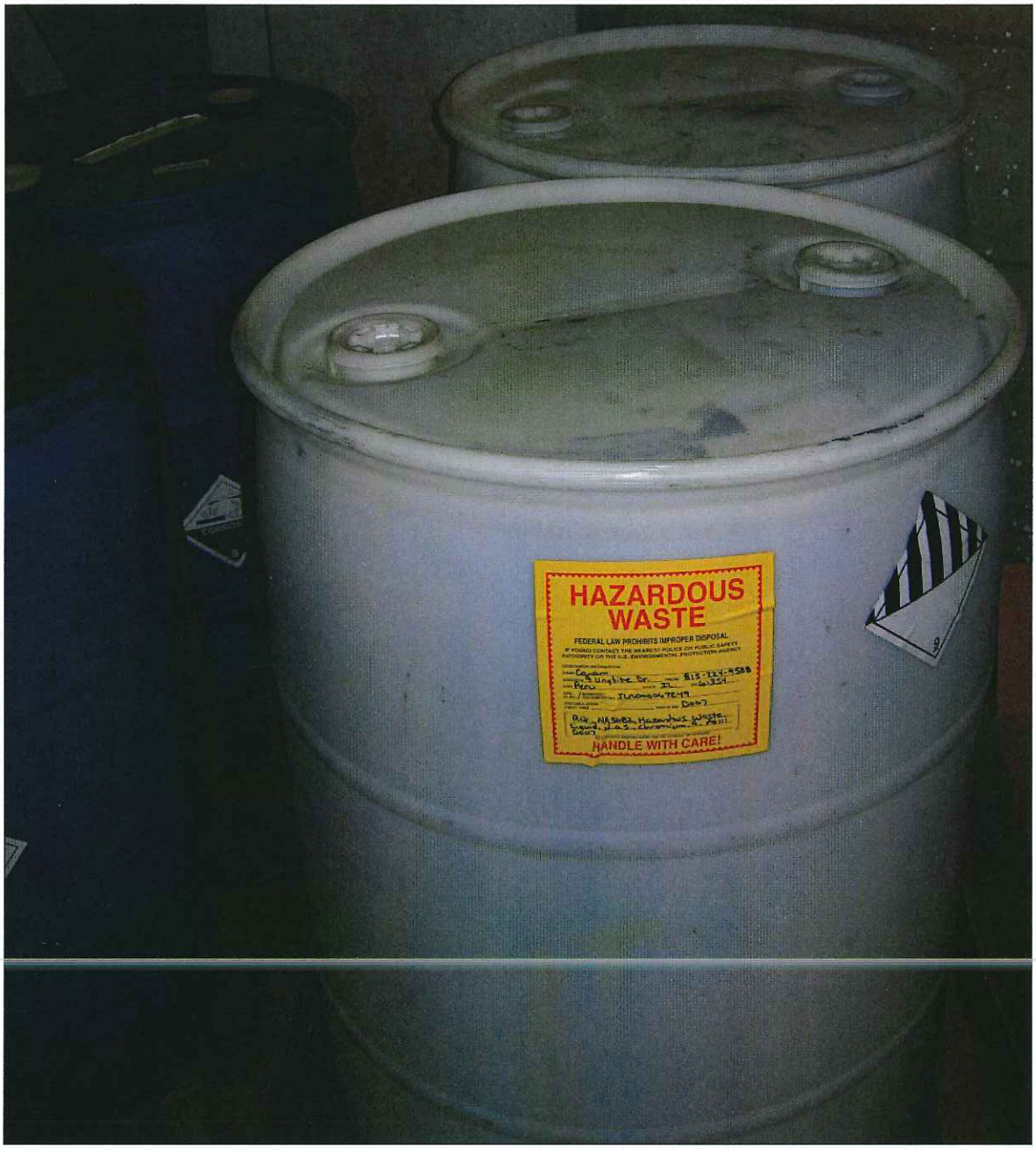
ATTACHMENT A
Photograph Log

Photograph No. 1
Date: June 16, 2015
Photographer: Spiros Bourgikos
Location: Canam Steel Corporation, Peru, Illinois
Subject: Three hazardous waste storage tanks.

Photograph No. 2
Date: June 16, 2015
Photographer: Spiros Bourgikos
Location: Canam Steel Corporation, Peru, Illinois
Subject: Part of the wall and floor of the secondary containment of the storage tanks shown in Photograph No. 1



Photograph No. 3
Date: June 16, 2015
Photographer: Spiros Bourgikos
Location: Canam Steel Corporation, Peru, Illinois
Subject: Six drums of hazardous waste stored in the hazardous waste storage area.



Photograph No. 4
Date: June 16, 2015
Photographer: Spiros Bourgikos
Location: Canam Steel Corporation, Peru, Illinois
Subject: Two additional drums of hazardous waste stored in the hazardous waste storage area.

Photograph No. 5
Date: June 16, 2015
Photographer: Spiros Bourgikos
Location: Canam Steel Corporation, Peru, Illinois
Subject: A super sack storing solid hazardous waste.

Photograph No. 6
Date: June 16, 2015
Photographer: Spiros Bourgikos
Location: Canam Steel Corporation, Peru, Illinois
Subject: A close up of the hazardous waste label attached to the super sack shown in Photograph No. 5.

ATTACHMENT B
Checklist

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	**Section 722.111 Hazardous Waste Determination** Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No____ N/A____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes____ No____ N/A____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes____ No____ N/A____	808.121(a)
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No____ N/A____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes____ No ✓ N/A____	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No____ N/A____	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No____ N/A____	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes ✓ No____ N/A____	722.120(b)
	Section 722.121 Acquisition of Manifests	722.120(d)
	Has the generator used:	
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No____ N/A____	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes____ No____ N/A____	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A____	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No____ N/A____	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes ✓ No____ N/A____	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No____ N/A____	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes ✓ No____ N/A____	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No____ N/A____	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes ✓ No____ N/A____	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes ✓ No____ N/A____	
		722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
	Is there any hazardous waste ready for transport off-site? Yes________ No________ N/A________	
722.130	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes________ No________ N/A________	722.130
	Section 722.134 Accumulation Time	
(722.134(a))	Has the generator complied with the following requirements: Yes________ No________ N/A________	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes________ No________ N/A________ and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes________ No ? ________ N/A________ and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes________ No________ N/A________ and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes________ No________ N/A________	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes √ No________ N/A________	Not for the stockpile yard super sack
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes________ No________ N/A________	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes________ No________ N/A________	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes________ No________ N/A________ If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes________ No________ N/A________	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes________ No________ N/A________	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes________ No________ N/A √	Super sack was open
(725.272)	Is the waste compatible with the container and/or liner? Yes √ No________ N/A________	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes________ No √ N/A________	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes________ No________ N/A________	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes_____ No_____ N/A_____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes_____ No ✓ N/A_____	Yes but stopped documenting storms in 2014
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes_____ No_____ N/A ✓ **Note:** See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes_____ No_____ N/A_____ COMMENTS:	
(725.278)	**Section 725.278 Air Emission Standards** Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A ✓ Comments:	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes_____ No_____ N/A_____ **Note:** If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
	Has the generator closed an accumulation area? Yes_____ No_____ N/A_____	725.211
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes_____ No_____ N/A_____	725.214
(725.290)	Does the facility accumulate or treat hazardous waste in tanks? Yes ✓ No_____ N/A_____ **Note:** A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J. a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks **existing** prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes_____ No_____ N/A_____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the wastes? Yes_____ No_____ N/A_____ 3) existing corrosion protection measures? Yes_____ No_____ N/A_____ 4) documented age of the tank system? Yes_____ No_____ N/A_____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes_____ No_____ N/A_____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes_____ No_____ N/A_____ **Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For **new** tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes_____ No not sure N/A_____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the waste(s) to be handled? Yes_____ No_____ N/A_____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes_____ No_____ N/A_____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes_____ No_____ N/A_____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes_____ No_____ N/A_____	tanks installed in 2002 could not produce assessment report
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	Is secondary containment provided for any new tank system before being put into service? Yes ✓ No____ N/A____ Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes____ No ✓ N/A ✓ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes____ No____ N/A____ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes____ No____ N/A____ or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes____ No____ N/A____ For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes____ No____ N/A ✓	
(725.293(b))	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes____ No____ N/A____ Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes____ No____ N/A____	Not sure
(725.293(c))	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes ✓ No____ N/A____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes ✓ No____ N/A____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes____ No____ N/A____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes ✓ No____ N/A____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes____ No____ N/A____ **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	← stuff was not sure
(725.293(d))	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or NO 3) a double-walled tank; or NO 4) an equivalent device (approved by the Board)? Yes____ No____ N/A____	
(725.293(e))	Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes____ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes ✓ No____ N/A____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes____ No____ N/A____ 2) Are welded flanges, joints and connections inspected daily? Yes____ No____ N/A____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes____ No____ N/A____ 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes____ No____ N/A____	
(725.293(i))	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes____ No____ N/A____ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes____ No____ N/A____ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes____ No____ N/A____ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes____ No____ N/A____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes____ No____ N/A____ 2) overfill prevention controls? Yes ✓ No____ N/A____ 3) sufficient freeboard in uncovered tanks? Yes ✓ No____ N/A____	sensor S working capacity 200 gallons less than design
(725.294(c))	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes____ No____ N/A____ 2) the aboveground portion of the tank system for corrosion or releases? Yes____ No____ N/A____ 3) data from monitoring equipment? Yes____ No____ N/A____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes____ No____ N/A____	tanks visually inspect every morning
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes____ No____ N/A____	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes____ No ✓ N/A____	could not produce record.

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes_____ No_____ N/A__✓__ b) removed applicable waste from the system within 24 hours of detection? Yes_____ No_____ N/A_____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes_____ No_____ N/A_____	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes_____ No_____ N/A_____ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes_____ No_____ N/A_____ **Note:** Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	
(725.296(e))	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes_____ No_____ N/A_____ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes_____ No_____ N/A_____ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes_____ No_____ N/A_____ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes_____ No_____ N/A_____	
(725.296(f))	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes_____ No_____ N/A_____ **Note:** If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
(725.297(a))	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes_____ No_____ N/A__✓__	
(725.297(a))	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes_____ No_____ N/A_____	
(725.297(b))	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes_____ No_____ N/A_____ **Note:** Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	Are ignitable or reactive wastes placed in a tank system? Yes_____ No_____ N/A✓ If "No", skip to Section 725.299. Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes_____ No✓ N/A_____ - Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ or Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes_____ No✓ N/A_____ or Is the tank used solely for emergencies? Yes_____ No_____ N/A_____	
(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes_____ No_____ N/A_____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes_____ No_____ N/A_____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes_____ No_____ N/A_____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ COMMENTS:	
(725.302)	**Section 725.302 Air Emission Standards** Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A✓ Comments:	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PREPAREDNESS AND PREVENTION	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No____ N/A____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes ✓ No____ N/A____ b) a telephone or other device to summon emergency assistance from local authorities? Yes____ No____ N/A____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes____ No____ N/A____ d) water at adequate volume and pressure for fire control? Yes____ No____ N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes____ No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes____ No____ N/A____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes____ No____ N/A____	
(725.135)	Is the facility maintaining adequate aisle space? Yes____ No____ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes____ No____ N/A____ - agreements designating the primary authority where more than one police or fire department might respond? Yes____ No____ N/A____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes____ No____ N/A____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes____ No____ N/A____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes ✓ No____ N/A____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes____ No____ N/A____	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes____ No ✓ N/A____ If "Yes", has the contingency plan been carried out immediately? Yes____ No ✓ N/A____	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes ✓ No____ N/A____ - explosions? Yes ✓ No____ N/A____ - releases? Yes ✓ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? Yes____ No ✓ N/A____ - hospitals? Yes____ No____ N/A____ - contractors? Yes____ No____ N/A____ - emergency response teams? Yes____ No ✓ N/A____	
(725.152(d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes____ No____ N/A____	
(725.152(e))	Does the plan identify all emergency equipment including: - description? Yes____ No____ N/A____ - capability? Yes____ No____ N/A____ - location? Yes____ No____ N/A____ Is the list of emergency equipment up-to-date? Yes____ No____ N/A____	
(725.152(f))	Does the plan include: - an evacuation plan? Yes____ No____ N/A____ - an evacuation signal? Yes____ No____ N/A____ - alternate evacuation routes? Yes____ No____ N/A____	part of the Emergency Plan
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes ✓ No____ N/A____ b) submitted to: - police department? Yes____ No ✓ N/A____ - fire department? Yes____ No ✓ N/A____ - hospital? Yes____ No ✓ N/A____ - emergency response teams? Yes____ No ✓ N/A____	
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes ✓ No____ N/A____ b) the plan fails in an emergency? Yes____ No____ N/A____ c) the facility changes in a way that modifies the emergency response necessary? Yes____ No____ N/A____ d) information regarding emergency coordinators changes? Yes____ No____ N/A____ e) information regarding equipment changes? Yes____ No____ N/A____	
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes ✓ No____ N/A____ Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No____ N/A____ Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No____ N/A____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes____ No ✓ N/A____ **Note:** If the facility has had a release, explain in detail.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	**Section 725.116 Personnel Training** Does the facility have a training program? Yes_____ No_____ N/A_____ Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes_____ No_____ N/A_____ Is the program directed by a person trained in hazardous waste management procedures? Yes_____ No_____ N/A_____ Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes_____ No_____ N/A_____ Does the program cover, at a minimum: - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes_____ No_____ N/A_____ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes_____ No_____ N/A_____ - key parameters for automatic waste feed cut-off systems? Yes_____ No_____ N/A_____ - communications or alarm systems? Yes_____ No_____ N/A_____ - response to fire or explosions? Yes_____ No_____ N/A_____ - response to groundwater contamination incidents? Yes_____ No_____ N/A_____ - shutdown of operations? Yes_____ No_____ N/A_____	no training records
(725.116(b))	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes_____ No_____ N/A_____	
(725.116(c))	Have facility personnel received an annual review of the initial training? Yes_____ No_____ N/A_____	
(725.116(d))	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes_____ No_____ N/A_____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes_____ No_____ N/A_____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes_____ No_____ N/A_____ 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes_____ No_____ N/A_____	
(725.116(e))	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	**Section 728.107 Waste Analysis and Recordkeeping** Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes_____ No_____ N/A_____ Is the plan on-site? Yes_____ No_____ N/A_____ Does the plan include a detailed physical and chemical analysis? Yes_____ No_____ N/A_____ Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes_____ No_____ N/A_____ Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes_____ No_____ N/A_____	
722.134(c)	**Section 722.134 Satellite Accumulation** Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes_____ No_____ N/A_____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes_____ No_____ N/A_____ If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes_____ No_____ N/A_____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes_____ No_____ N/A_____	
722.134(g)	**Note:** A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	**Section 722.140 Recordkeeping** Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes_✓_ No_____ N/A_____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes_____ No_____ N/A_____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes_✓_ No_____ N/A_____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes_____ No_____ N/A_____	722.140(d)
722.141(a)	**Section 722.141 Annual Reporting** Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes_✓_ No_____ N/A_____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes_____ No_____ N/A_____	722.141(b)
	Section 722.142 Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes_____ No_____ N/A✓	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes_____ No_____ N/A✓	722.142(a)(2)
722.143	**Section 722.143 Additional Reporting** Has the generator furnished additional reports as required by the Director? Yes_____ No_____ N/A_____	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes_____ No✓ N/A_____ If "Yes", has the generator complied with the requirements of Subpart E? Yes_____ No_____ N/A_____	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes_____ No_____ N/A✓ If "Yes", has the generator complied with the requirements of Subpart F? Yes_____ No_____ N/A✓	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes_____ No_____ N/A✓ If "Yes", has the generator complied with the requirements of Subpart G? Yes_____ No_____ N/A✓	722.170
	COMMENTS:	

TM:jab\722LQG.doc

ATTACHMENT C
Document(s) Coppied

1. Preparedness, prevention and Contingency Plan, Revised 5/1/2013 - 46 pages.

2. Hazardous waste storage tank schematic diagram - 1 page.

3. Chamlin & Associates letter dated July 11, 2005 - one page.

ATTACHMENT D
Chamlin & Associates Analysis Letter

CHAMLIN & ASSOCIATES

3017 FIFTH STREET • P.O. BOX 424 • PERU, IL 61354
815-223-3344 • FAX 815-223-3348
engineering@chamlin.com

ENGINEERS • SURVEYORS • PLANNERS

July 11, 2005

United Steel Deck Inc.
9 Unytite Dr.
Peru, IL 61354

ATTENTION: Jack Downey

SUBJECT: Steel Tank and Containment Wall Analysis

Dear Mr. Downey:

Per your request, Chamlin & Associates Inc. has performed an analysis of three (3) steel in-house fabricated tanks and surrounding masonry containment wall located in your Peru Facility. The purpose of our evaluation was to determine the structural adequacy of these components.

In order to determine the structural adequacy of the tank structures, a Finite Element Analysis (FEA) model was generated and analyzed. The results of that analysis indicated that the stresses in the tank components (i.e. tube steel columns, angle banding and plate walls) are within allowable limits when the fluid level is limited to a height of 15 feet of water or 11 feet of fluids with a specific gravity equal to 1.45. We would therefore recommend that you monitor your plant process needs in order to ensure that the stated fluid limits are adhered to.

A check of the reinforced masonry containment wall design indicates that it can adequately contain water to a height of 40 inches and fluids with a specific gravity of 1.45 to a height of 36 inches prior to overstressing the reinforcement. This result is based on the proper embedment of the masonry reinforcement into the floor slab.

I sincerely apologize for the deferred completion of this report due to consequent analyses and ask that you not hesitate to call if you have any questions regarding this matter.

Respectfully,

CHAMLIN & ASSOCIATES, INC.

Jorge L. Sanchez, S.E., P.E.

LICENSED STRUCTURAL ENGINEER
JORGE L. SANCHEZ
81-006073
PERU
ILLINOIS
STATE OF ILLINOIS
Exp 11/06

JLS/cbc

cc: File No. 11495.00